REMARKS

Claim 1 stands rejected under 35 U.S.C. § 112, first paragraph (written description). It is respectfully submitted that the enclosed amendment obviates the issue raised by the Examiner. Accordingly, it is respectfully requested that this rejection be withdrawn.

Claim 1 stands rejected under 35 U.S.C. § 112, second paragraph because "the target document" in line 16 allegedly lacks antecedent basis. This rejection is respectfully traversed as line 7 of claim 1 recites in pertinent part "... in a target document ..." so as to provide antecedence for "the target document" in line 16. Accordingly, it is respectfully requested that this rejection be withdrawn.

Claim 1 stands rejected under 35 U.S.C. § 102 as being anticipated by Sampath. This rejection is respectfully traversed for the following reasons.

In order to expedite prosecution, Applicants' representative initiated a telephone interview with Examiner Debrow. The Examiner requested that Applicants submit a written response to the outstanding Office Action, **after review of which the Examiner would contact Applicants' representative prior to issuing the next Office Action if there were any issues remaining regarding the distinctions of claim 1 over Sampath**. Applicants and Applicants' representative would like to thank Examiner Debrow for his courtesy in conducting the interview and for his assistance in resolving issues.

As noted on page 7 of the outstanding Office Action, the Examiner has maintained the pending rejection over Sampath based on the claimed phrase "character train variable ***or*** the data variable with a tag" whereby the Examiner asserted that Sampath need only disclose one of the

two variable to read on claim 1. Indeed, the Examiner does not assert that Sampath discloses a "data variable with a tag."

Accordingly, claim 1 has been amended to recite both a "character train variable ***and*** a data variable with a tag" as part of the document creation support system. It is respectfully submitted that claim 1 as amended obviates the Examiner's broad interpretation thereof in which the Examiner relies on Sampath's alleged disclosure of a "character train variable" to read on claim 1. Sampath does not suggest replacing structured documents such as figures, tables, complex words, etc. (i.e., "data variable with a tag) in the document creation process but only performs, at best, the conventional simple-word replacement.

As previously noted, page 2, lines 11-19 of Applicants' specification expressly distinguishes between a "character train variable" and a "data variable with a tag" so as to emphasis the different and independent meanings associated with the two terms. Specifically, Applicants' specification discloses (emphasis added):

> [w]hen the character train variable is defined, one replaced by the definition of the character train variable ***is a relatively simple word or the like***. In contrast, when the database component with a tag is defined, one replaced by the definition of the data variable with the tag ***is a structured document, table, or figure having a combination of a plurality of words***. Therefore, the database component with a tag has a structure more complicated as compared to the structure of the character train variable.

Such a difference between a "character train variable" and a "data variable with a tag" is illustrated in Figure 7 of Applicants' drawings and described in the corresponding description thereof (*see, e.g.,* page 11, line 27 – page 12, line 8 of Applicants' specification), where the data variable with tag 720 is a 3 x 2 table including a combination of a plurality of words while character train variables 710, 711, 712 are just simple words. Indeed, one of the inventive features of the present invention is the enablement of a document creation support system in

which complicated structured documents having, for example, a combination of a plurality of words, tables and figures, etc., can be replaced with data variables with a tag. Sampath is completely silent as to such structured documents being selectively inserted into a document. In contrast, Sampath uses only ***tabular*** structures in which simple words are replaced (*see* paragraph [0015]; example being replacement values described at paragraph [0051]).

In this regard, one of the important distinctions between claim 1 and Sampath is that Sampath merely replaces simple words (character train variable) in pre-stored tables etc. of the template, whereas the present invention can introduce structured documents like different tables, figures, etc. (data variable with a tag) into the template from the variable – content database part. Sampath is completely silent as to introducing such data variables with tags as structured documents into the template, let alone suggest a variable-content database part for storing such tagged documents in the document creation system. In this regard, Sampath is merely cumulative to a conventional document creation system similar to Applicants' admitted prior art described in the Background section of Applicants' specification.

To further emphasize this distinction and the independence between a "character train variable" and a "data variable with a tag," claim 1 further recites in pertinent part that "the database component with a tag in the variable-content database part has a ***nested structure*** in which a character train variable and a data variable with a tag are embedded." As described on page 13, line 31 - page 14, line 1 of Applicants' specification, a character train ***and*** a data variable with a tag may be ***nested*** in the tagged database component 153.

Moreover, claim 1 further recites in pertinent part, "an input interface unit for inputting parameter information instructing a description change part in a target document with respect to

the template document." Enabling the input of parameters allows a document to be created flexibly in accordance with specification changes and allows not only simple character train data, but also data with a tag such as a document, table, or figure having a more complicated structure to be manipulated. Sampath discloses only a method of using a predefined document specification to translate the predefined specification into a structured document template. However, Sampath does not teach or suggest an input interface that accepts parameter information used to generate definitions for character train variables ***and data variables with tags*** that are located in the template. While the predefined structures may include placeholders for content and attributes, Sampath does not disclose using input parameters to fill in these placeholders. Rather, the placeholders are already associated with a particular database entry. Thus, the system disclosed by Sampath does not enable a document to be generated dynamically in accordance with specification changes related to, for example, data variables with tags.

In sum, Sampath is completely silent as to the alleged database component with a tag in the variable-content database part having a ***nested structure*** in which a character train variable and a data variable with a tag are embedded. Indeed, as mentioned above, Sampath discloses only a conventional document creator in which simple words (character train variable) are replaced in pre-stored tables etc. of the template, and is completely silent as to replacing entire figures, tables, complex words such as a data variable with a tag. It is respectfully submitted, moreover, that the distinction between a "character train variable" and a "data variable with a tag" has been made clear by the language in claim 1. It follows that Sampath does not disclose the "input interface unit" whereby data with a tag such as tables, figures, etc., having a more complicated structure, can be manipulated according to specification changes.

The Examiner is directed to MPEP § 2143.03 under the section entitled "All Claim Limitations Must Be Taught or Suggested", which sets forth the applicable standard for establishing obviousness under § 103:

> To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

In the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" as recited in claim 1 because the proposed combination fails the "all the claim limitations" standard required under § 103. Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below. To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,
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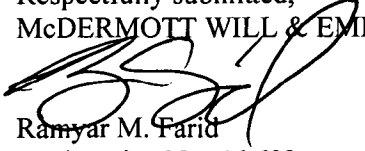

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